

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

R.K. et. al. )  
Plaintiffs, )  
v. )  
GOVERNOR BILL LEE, in his official )  
Capacity as GOVERNOR OF )  
TENNESSEE et. al. )  
Defendants. )  
No. 3:21-CV-00853

## DECLARATION OF ADRIENNE BATTLE

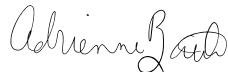
I declare under penalty of perjury that the foregoing is true and correct:

1. I am Adrienne Battle, and I am the Director of Schools for Metro Nashville Public Schools (“MNPS”). I have personal knowledge of the matters set forth herein.
2. As the Director of Schools, I am charged with the safety of all students and staff. I am also charged with implementing policies passed by the Metropolitan Board of Education.
3. MNPS believes that decisions about masking should be based on science and in the best interests of all students.
4. On August 5, 2021, the Metropolitan Board of Education passed a mask requirement for our students and staff.
5. Masks were adopted as a mitigation strategy for COVID-19 based primarily on their ability to reduce the chances that a person with the virus would transmit it to other people. That is why a universal masking policy is the most effective way of protecting

all students, staff, and their families when there is high community transmission and a significant portion of our school community could not be vaccinated.

6. The accommodation process set forth in HB9077/SB9014 is confusing and unfeasible. Purchasing N95 masks will be expensive and because of supply chain issues cannot be readily obtained. It is unclear what, if anything, is required or permitted in terms of requiring other students to mask as an accommodation for students with disabilities.
7. The provisions adopted by HB9077/SB9014 risk the health and safety of students, particularly those who are immunocompromised, by preventing the district from adopting policies based on scientific healthcare guidance. MNPS would prefer to be able to make decisions that keep students safe—especially those with disabilities that make them more medically vulnerable to COVID-19—without risking state funding for doing so.

---



Adrienne Battle

11/14/21

---

November 14, 2021